

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

RABBI MARA NATHAN, on behalf of herself and on behalf of her minor child, M.N., et al.,

Plaintiffs,

v.

ALAMO HEIGHTS INDEPENDENT SCHOOL DISTRICT, et al.,

Defendants.

CIVIL ACTION NO.  
5:25-cv-00756

**NOTICE OF CONSTITUTIONAL CHALLENGE TO STATE STATUTE**

Pursuant to Federal Rule of Civil Procedure 5.1, Plaintiffs file this notice that, on July 2, 2025, they filed a Complaint and Motion for a Preliminary Injunction (along with supporting declarations and exhibits). The Complaint challenges the constitutionality of Texas Senate Bill No. 10 (“S.B. 10”). Specifically, Plaintiffs allege that, by requiring elementary and secondary public schools to display the Ten Commandments in every classroom, in accordance with the minimum requirements of S.B. 10, the statute violates the Establishment Clause and the Free Exercise Clause of the First Amendment to the United States Constitution.

Plaintiffs will promptly serve this Notice along with the Complaint, Motion for Preliminary Injunction, and all supporting declarations and exhibits on the Texas Attorney General via certified mail.

Dated: July 2, 2025

Respectfully submitted,

By: /s/ Jonathan K. Youngwood  
SIMPSON THACHER & BARTLETT LLP  
Jonathan K. Youngwood  
Janet A. Gochman\*  
Noah Gimbel\*  
Jordan T. Krieger\*  
Avia Gridi\*  
Kristen Crow\*  
425 Lexington Avenue  
New York, NY 10017  
(212) 455-2000  
*jyoungwood@stblaw.com*  
*jgochman@stblaw.com*  
*Noah.Gimbel@stblaw.com*  
*jordan.krieger@stblaw.com*  
*avia.gridi@stblaw.com*  
*kristen.crow@stblaw.com*

AMERICAN CIVIL LIBERTIES UNION  
OF TEXAS FOUNDATION, INC.  
Adriana Piñon  
Thomas Buser-Clancy  
Sarah Corning\*\*  
Chloe Kempf  
P.O. Box 8306  
Houston, TX 77288  
(713) 942-8146  
*apinon@aclutx.org*  
*tbuser-clancy@aclutx.org*  
*scorning@aclutx.org*  
*ckempf@aclutx.org*

AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION, INC.  
Daniel Mach\*  
Heather L. Weaver\*  
915 15th Street, NW, Suite 600  
Washington, DC 20005  
(202) 675-2330  
*dmach@aclu.org*  
*hweaver@aclu.org*

AMERICANS UNITED FOR  
SEPARATION OF CHURCH & STATE  
Alex J. Luchenitser\*  
Amy Tai\*  
Jess Zalph\*  
Alexandra Zaretsky\*  
1310 L Street NW, Suite 200  
Washington, DC 20005  
(202) 466-7306  
*luchenitser@au.org*  
*tai@au.org*  
*zalph@au.org*  
*zaretsky@au.org*

FREEDOM FROM RELIGION  
FOUNDATION  
Patrick C. Elliott  
Samuel T. Grover  
Nancy A. Noet\*  
P.O. Box 750  
Madison, WI 53701  
(608) 256-8900  
*patrick@ffrf.org*  
*sgrover@ffrf.org*  
*noetn@ffrf.org*

*Counsel for Plaintiffs*

\* Motion for *Pro Hac Vice* Admission  
Forthcoming  
\*\* Admission Application Forthcoming

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Notice will be personally served on each Defendant pursuant to the Federal Rules of Civil Procedure, along with the Summons and Complaint in this action, immediately following the issuance of the Summons documents by the Western District of Texas Clerk's Office. A Request for Issuance of Summons has been filed on the case docket as ECF Document No. 2 and is currently pending.

I further certify that, following issuance of the Summons documents by the Western District of Texas Clerk's Office, the foregoing Notice, along with the Summons and Complaint in this action, will be personally served upon the Texas Attorney General at the following address:

Gregory Abbott  
Texas Attorney General  
P.O. Box 12428  
Austin, Texas 78711

Dated: July 2, 2025

By: /s/ Jonathan K. Youngwood  
SIMPSON THACHER & BARTLETT LLP  
Jonathan K. Youngwood  
425 Lexington Avenue  
New York, NY 10017  
(212) 455-2000  
*jyoungwood@stblaw.com*

*Counsel for Plaintiffs*